



September 10, 2024

VIA ECF

Hon. Judge Lewis A. Kaplan
United States District Court
Southern District of New York
U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Ryan Salame*
Case No. 1:22-cr-00673-LAK

Dear Judge Kaplan:

Please accept this as our reply paper. Defendant reiterates that he does not seek any relief from this Court. On August 29, Defendant filed a notice of withdrawal of his Petition. Dkt. 484. We understand that this Court has not accepted the withdrawal. Dkt. 485. Defendant therefore respectfully requests leave to withdraw the Petition.

Additionally, although the notice of withdrawal sought to withdraw the Petition “without prejudice,” Defendant confirms that he does not intend to litigate the Petition in this or any other court. Therefore, Defendant respectfully requests that the Court grant leave to withdraw the Petition “with prejudice.”

Finally, we note that the Government is not seeking an evidentiary hearing in this matter, Dkt. 491 at 28–29, and neither is Defendant.

We look forward to the opportunity to discuss this matter on September 12.

Respectfully submitted,

/s/ H. Christopher Bartolomucci
H. Christopher Bartolomucci

Counsel for Defendant Ryan Salame

cc: All counsel of record (via ECF)

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